October 24, 2017

Michelle Ramirez
Office of Environmental Health Hazard Assessment
P.O. Box 4010, MS-12B
Sacramento, California 95812-4010.

Re: Californians for Pesticide Reform coalition comments on Prop. 65 listing for chlorpyrifos

Dear Ms. Ramirez,

On behalf of the Natural Resources Defense Council, United Farm Workers, United Farm Workers Foundation, and the steering committee and 190+ member organizations of the Californians for Pesticide Reform coalition, thank you for taking up the matter of chlorpyrifos as a Prop. 65-listed substance based on its reproductive and developmental toxicity. Chlorpyrifos exposure has been a central concern of California's farmworking communities for a decade or

more, and yet California agriculture continues to depend heavily on this neurotoxic chemical, with over a million pounds a year used on a wide range of crops. But its ubiquity should not be allowed to mask or excuse its extreme toxicity. After many years of campaigning, a hard-won victory for public health was within reach last year when US EPA scientists determined that chlorpyrifos was unsafe to use on food-related crops in any amount, and proposed a federal ban.. However, EPA Administrator Scott Pruitt reversed course in March and refused to implement the ban. Since that time, we have turned our efforts to California to protect our residents where the federal government has failed.

Our coalition members wish to express to you the deep concern they share regarding the devastation caused by chlorpyrifos, and the impact it has on the health and potential of young children, particularly those who live in California's agricultural regions in the Central Valley and Central Coast. After a series of drift incidents this summer, there can be no doubt that the threat of exposure to chlorpyrifos and other hazardous pesticides is all too real.

On May 5th in Kern County, more than 50 workers harvesting cabbages were exposed to chlorpyrifos drifting from a tangerine grove over half a mile away. An hour into the shift, a 19 year-old worker named Aylin noticed all of the cabbage pickers around her had suddenly stopped working. Some of her co-workers fainted, and others started vomiting. Aylin, too, became sick: her lips were tingling, her mouth was dry. She later described it as "one of the scariest days ever."

According to news reports, emergency responders performed a mass decontamination, but many of the workers had left by the time medical help arrived. Aylin went to the ER, where hospital staff did a visual check-up before releasing her. "I have always known how dangerous pesticides can be, but I never thought I would one day have to go to the emergency room because of them," Aylin commented.

After Aylin got home, she tried to take precautions to protect her young siblings, but notes that workers weren't told what to do with their soiled clothes. "I didn't dare come inside my house when I arrived because I was afraid I would also contaminate my brother and sister who live with me," Aylin said. "I changed clothes outside." Despite her precautions, the hazardous chemical followed her home from the fields anyway. "My mom's boyfriend accidentally used my soiled shirt to pat his face dry in the backyard. Moments later, his eyes and face got irritated."

Investigations continue into a string of similar incidents that have taken place just since May in Madera, Kern, Monterey and Santa Cruz Counties. Chlorpyrifos was known to be one of several pesticides in use nearby in three of these incidents.

Although acute incidents, where workers suddenly become sick after being drifted on, garner headlines and attention, residents are much more worried about the long-term health consequences of constant, low level exposure, especially for the brain development of young children. Mother of five Fidelia Morales lives in Tulare County in a home surrounded by citrus groves. Her nine-year-old son has trouble concentrating in school and staying seated in class – and she suspects chlorpyrifos is to blame. Last year, an air blast sprayer sent chemicals floating onto her property, landing on her family's red and blue jungle gym.

"We know this is dangerous for the kids, but what are we supposed to do?" she said. Morales said she fears that this kind of drift, as well as long-term exposure to a variety of chemicals in the air, have hurt her children, ages 9 to 20, who have struggled to focus in school and have suffered from bronchitis, asthma and other chronic illnesses.[1]

Orange Cove resident Claudia Angulo also lives among citrus groves. She was just 17 when she witnessed a plane spraying chlorpyrifos onto a group of workers, some of them pregnant women. All of them lost their babies. Years later, her son Isaac was born with cognitive impairment and ADHD, and she's sure of the culprit. "Chlorpyrifos damaged my son's brain for life," she says.

Claudia notes that during her pregnancy, her work involved sorting produce that had been treated with chlorpyrifos. In all, ten of the women in her work crew were pregnant. Over the years, she learned that five of the women had children with ADHD, two other babies had heart problems, and two more were born with respiratory problems and eczema. Two years ago, her son's hair was tested for a French documentary on the childhood health impacts of pesticides. Her son had trace amounts of more than 50 pesticides in his body, with chlorpyrifos the highest.

"Since Isaac's diagnosis, I have worked tirelessly to raise awareness among farmworkers, the public and politicians about the effects of chlorpyrifos on the health of our communities," said Claudia. "That the head of the EPA would rather put our country's health at risk than protect us from preventable illnesses makes me very angry. Chlorpyrifos was banned almost 20 years ago from household products because it was deemed too dangerous for children. So how can this toxic pesticide still be used on food crops? Ultimately, these same crops are hand-picked by farmworkers and eaten by kids."[2]

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[1] "'Like a slow death': families fear pesticide poisoning after Trump reverses ban." https://www.theguardian.com/us-news/2017/apr/17/california-pesticides-central-valley-trump

[2] "Chlorpyrifos damaged my son's brain for life." https://earthjustice.org/blog/2017-may/el-clorpirif-s-da-el-cerebro-de-mi-hijo-de-por-vida

Zenaida Muñoz, a 32-year-old mother of three and resident of the small Tulare County community of Cutler, said she used to walk through the orange groves on a daily basis for exercise when she was pregnant with one of her sons, who is now nine years old. After he was born, he struggled to speak for several years and had behavioral problems at home and in school. He was later diagnosed with autism. "I never realized these chemicals could potentially cause harm," she said.

Muñoz said she now avoids the local orchards, especially when she can smell recently sprayed pesticide – a stench that makes her want to throw up. Families that live across from the crops should consider moving, she added: "Even if it seems like they're not impacted, they are."[3]

Although it's impossible to know with certainty what caused the health problems experienced by the community members who've shared their stories, numerous epidemiological studies have linked chlorpyrifos exposure to a host of neurodevelopmental problems, and ultimately led the US EPA to propose a federal ban.

Unfortunately, here in California we do not yet have the necessary protections in place to assess or prevent neurodevelopmental harm from continued use of chlorpyrifos. In its revised Draft Evaluation, the Department of Pesticide Regulation decided to use cholinesterase inhibition as its endpoint instead of neurodevelopmental harm. This decision has resulted in an inhalation target risk level for women of childbearing age many thousands of times higher than the level the US EPA's 2016 risk analysis determined to protect against neurodevelopmental harm.

On behalf of the many families in California who live with chlorpyrifos exposure every day and who worry about the harm it is causing their children, we urge you to use your expertise and scientific leadership to synthesize the overwhelming evidence of neurodevelopmental harm caused by chlorpyrifos. Your determination that chlorpyrifos is a developmental toxicant under Prop. 65 is an essential first step in providing critical protections for California's most vulnerable children.

Thank you for your service to identifying and addressing developmental toxicants that threaten the health and potential of California's children.

Sincerely,

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[3] "'Like a slow death': families fear pesticide poisoning after Trump reverses ban." https://www.theguardian.com/us-news/2017/apr/17/california-pesticides-central-valley-trump

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